

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

William Edward McGEE

Case No. Case: 2:23-mj-30012
Assigned To : Unassigned
Assign. Date : 1/13/2023
Description: COMP USA V. MCGEE
(KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 28, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 13, 2023

City and state: Detroit, Michigan



Complainant's signature

Task Force Officer Jaclyn Kocis-Maniaci - ATF

Printed name and title



Judge's signature

Honorable Jonathan J.C. Grey, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigations involving firearms and narcotics cases resulting in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that William MCGEE (DOB xx/xx/1993) has violated 18 U.S.C. § 922(g)(1), felon in possession of a firearm, and does not contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. On December 28, 2022, Detroit Police Officers, working in an undercover capacity, observed MCGEE concealing a handgun, while walking in the area of Morang and McKinney St, in the City of Detroit. The undercover officers advised, via radio, of their observations and the location where MCGEE was walking. When Detroit Police Officers arrived, they observed MCGEE walking on the south sidewalk matching the description given by the undercover officers.

5. DPD officers pulled along the curb and asked MCGEE, if he was carrying a firearm. MCGEE then put his phone in his pocket and fled, on foot, from the officers. One officer pursued MCGEE on foot while the other officer followed in a marked Detroit Police scout car. During the foot chase, MCGEE was observed clutching at his right side with his right hand. MCGEE ran onto Morang, ran behind a vehicle that was stationary, then in front of a United Parcel Service, “UPS” truck. MCGEE continued to run between the UPS truck, passenger side, and a vehicle west bound down Morang on south sidewalk. As the officer and MCGEE passed the open passenger side door of the UPS truck, officers heard a loud thumping sound, like metal banging on metal. When the officers passed the passenger side of the UPS truck, the UPS driver yelled out, that MCGEE threw something in the truck. The UPS driver was advised not to leave.

6. Officers caught up to MCGEE and ordered him to stop running. MCGEE continued to back away and actively resist the officers. After a physical altercation, officers were able to place MCGEE under arrest by placing handcuffs on his wrists. Officers returned back to the UPS truck and recovered a firearm.

7. The officers recovered the firearm they observed MCGEE throw into the passenger side of the UPS truck, a Taurus, 9mm handgun, model G2C, Serial number ADD211896. The firearm was loaded with multiple rounds, with one round chambered.

8. On December 29, 2022, a computerized criminal history check showed that MCGEE has the following felony convictions, which are punishable by imprisonment of a term exceeding one year:

- a. 2013 – attempt felony, home invasion, 1st degree, 3rd Circuit Court, Detroit, Michigan;
- b. 2015-felony, home invasion, 1st degree and Police Officer Fleeing 3rd degree, 3rd Circuit Court, Detroit, Michigan.

9. On January 10, 2023, ATF Special Agent Joshua McLean advised, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the State of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

III. CONCLUSION

10. Probable cause exists that William MCGEE, a convicted felon aware of his felony convictions, did knowingly possess a firearm and ammunition that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1). Said violation occurring on or about December 28, 2022, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.



Jaclyn Kocis-Maniaci, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means



HON. JONATHAN J.C. GREY
UNITED STATES MAGISTRATE JUDGE

Date: January 13, 2023